L. Matt Wilson GA Bar No: 768801

THE WILSON LAW FIRM, PC

950 East Paces Ferry Road Suite 3250 - Atlanta Plaza Atlanta, Georgia 30326

Telephone: (404)364-2240 Facsimile: (404)266-7459

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:	)	
LEHMAN BROTHERS HOLDINGS, INC.	)	Case No. 08-13555-jmp
Debtor.	)	Chapter 11

## MOTION FOR APPOINTMENT OF EQUITY COMMITTEE

COMES NOW, Greg Georgas, an equity-security holder of the above-named debtor, and represents to this court that the appointment of an additional committee of equity-security holders is necessary to assure adequate representation of equity-security holders, in that \_\_\_\_\_\_, and requests that the court order the appointment of an additional committee of equity-security holders by the United States Trustee pursuant to 11 U.S.C. § 1102 (a).

This 19<sup>th</sup> day of September, 2008.

THE WILSON LAW FIRM, P.C.

/s/ L. Matt Wilson

L. Matt Wilson Georgia Bar No. 768801 (*Pro Hac Vice* Application Pending)

## THE WILSON LAW FIRM, P.C.

950 East Paces Ferry Road Suite 3250 - Atlanta Plaza Atlanta, Georgia 30326

Telephone: (404)364-2240 Facsimile: (404)266-7459

 $Z:\ \ WP\ 830\ 01\ \ Motion for Appointment of Equity Committee.wpd$ 

#### **Marc Abrams**

Willkie Farr & Gallagher LLP 787 Seventh Avenue New York, NY 10019-6099 (212) 728-8000 (212) 728-8111 (fax) maosbny@willkie.com

## George Angelich

Arent Fox LLP 1675 Broadway New York, NY 10019 (212) 457-5423 (212) 484-3990 (fax) angelich.george@arentfox.com

## Walter Benzija

Halperin Battaglia Raicht, LLP 555 Madison Avenue 9th Floor New York, NY 10022 (212) 765-9100 (212) 765-0964 (fax) wbenzija@halperinlaw.net

## **Bradford M. Berry**

Office of General Counsel Commodity Futures Trading Commission 1155 21st Street, NW Washington, DC 20581 (202) 418-5127 bberry@cftc.gov

## Martin J. Bienenstock

Dewey & LeBoeuf LLP 1301 Avenue of the Americas New York, NY 10019 212-259-8530 212-259-6333 (fax) martin.bienenstock@dl.com

#### **Matthew Allen Cantor**

Normandy Hill Capital L.P. 150 East 52nd Street 10th Floor New York, NY 10022 (212) 616 2113 212-616-2101 (fax) mcantor@normandyhill.com

## James S. Carr

Kelley Drye & Warren LLP 101 Park Avenue New York, NY 10178 (212) 808-7955 (212) 808-7897 (fax) jcarr@kelleydrye.com

#### Maureen A. Cronin

Debevoise & Plimpton, LLP 919 Third Avenue New York, NY 10022 (212) 909-6292 (212) 909-6836 (fax) macronin@debevoise.com

#### Israel Dahan

Cadwalader Wickersham & Taft, LLP One World Trade Financial Center New York, NY 10281 (212) 504-6000 (212) 504-6666 (fax) israel.dahan@cwt.com

## George A. Davis

Cadwalader, Wickersham & Taft LLP One World Financial Center New York, NY 10281 (212)504-6000 (212)504-6666 (fax) george.davis@cwt.com

#### Paul H. Deutch

Troutman Sanders LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
(212) 704-6000
(212) 704-6137 (fax)
paul.deutch@troutmansanders.com

#### **Michael James Edelman**

Vedder, Price, Kaufman & Kammholz, P.C. 1633 Broadway 47th Floor New York, NY 10019 (212) 407-7700 (212) 407-7799 (fax) mjedelman@vedderprice.com

## Charles R. Ekberg

Lane Powell PC 1420 Fifth Avenue Suite 4100 Seattle, WA 98101-2338 (206) 223-7012 (206) 613-4255 (fax) ekbergc@lanepowell.com

#### **David Elrod**

Elrod, PLLC 500 North Akard Suite 3000 Dallas, TX 75201 (214) 855-5188 (214) 855-5183 (fax) delrod@elrodtrial.com

## Daniel J. Flanigan

Polsinelli Shalton Flanigan Suelthaus PC 700 West 47th Street Suite 1000 Kansas City, MO 64112 (816) 753-1000 (816) 753-1536 (fax) dflanigan@polsinelli.com

#### Eduardo J. Glas

McCarter & English, LLP 100 Mulberry Street Newark, NJ 07102 (973) 622-4444 (973) 624-7070 (fax) eglas@mccarter.com

#### Matthew J. Gold

Kleinberg, Kaplan, Wolff & Cohen, P.C. 551 Fifth Avenue 18th Floor
New York, NY 10176
(212) 880-9827
(212) 986-8866 (fax)
mgold@kkwc.com

## **Antonia Golianopoulos**

Mayer Brown Rowe & Maw, LLP 1674 Broadway New York, NY 10019-5820 (212) 506-2500 (212) 262-1910 (fax) agolianopoulos@mayerbrownrowe.com

## Howard R. Hawkins, Jr.

Cadwalader, Wickersham & Taft LLP One World Financial Center New York, NY 10281 (212) 504-6000 (212) 504-6666 (fax) howard.hawkins@cwt.com

## Dion W. Hayes

McGuireWoods LLP 901 East Cary Street Richmond, VA 23219-4030 (804) 775-1144 (804) 698-2078 (fax) dhayes@mcguirewoods.com

#### Ira L. Herman

Thompson & Knight, LLP 919 Third Avenue, 39th Floor

New York, NY 10022

(212) 751-3045

(214) 999-9139 (fax)

ira.herman@tklaw.com

Assigned: 09/16/2008 representing Direct Energy Business, LLC

(Unknown) John E. Jureller, Jr.

Klestadt & Winters, LLP

292 Madison Avenue

17th Floor

New York, NY 10017

(212) 972-3000

(212) 972-2245 (fax)

jjureller@klestadt.com

Assigned: 09/18/2008 representing Overstock.com, Inc.

(Creditor) Shareholders of Novastar Financial, Inc.

(Creditor) Gregory O. Kaden

Goulston & Storrs, P.C.

400 Atlantic Avenue

Boston, MA 02110-3333

617-482-1776

617-574-4112 (fax)

gkaden@goulstonstorrs.com

Assigned: 09/17/2008 representing Interactive Data Corporation

(Creditor) Deborah Kovsky-Apap

Pepper Hamilton LLP

100 Renaissance Center

**Suite 3600** 

Detroit, MI 48243-1157

(313) 393-7331

(313) 731-1572 (fax)

kovskyd@pepperlaw.com

Assigned: 09/17/2008 representing ING BANK, FSB

c/o Pepper Hamilton LLP

Attn: Deborah Kovsky-Apap

100 Renaissance Center

**Suite 3600** 

Detroit, MI 48243

usa

313.259.7110

313.259.7926 (fax)

kovskyd@pepperlaw.com

(Interested Party) Darryl S. Laddin

Arnall Golden Gregory LLP

171 17th Street NW

**Suite 2100** 

Atlanta, GA 30363-1031

(404) 873-8120

(404) 873-8121 (fax)

bkrfilings@agg.com

Assigned: 09/19/2008 representing Verizon Communications Inc.

(Creditor) David M. LeMay

Chadbourne & Parke, LLP

30 Rockefeller Plaza

New York, NY 10112

(212) 408-5112

(212) 541-5369 (fax)

dlemay@chadbourne.com

Assigned: 09/19/2008 representing Amber Capital Investment Management

c/o Chadbourne & Parke LLP

30 Rockefeller Plaza

New York, NY 10112

**United States** 

212-408-5100

212-541-5369 (fax)

dlemay@chadbourne.com

(Creditor) Shari D. Leventhal

Federal Reserve Bank of New York

33 Liberty Street

Main Building, 7th Floor

New York, NY 10045

(212) 720-5018

(212) 720-8709 (fax)

shari.leventhal@ny.frb.org

Assigned: 09/17/2008 representing Federal Reserve Bank of New York

33 Liberty Street

New York, NY 10045

212-720-5018

212-720-8709 (fax)

shari.leventhal@ny.frb.org

(Creditor) Richard B. Levin

Cravath, Swaine & Moore LLP

825 Eighth Avenue

New York, NY 10019

(212) 474-1000

(212) 474-3700 (fax)

rlevin@cravath.com

Assigned: 09/15/2008 representing Credit Suisse

11 Madison Avenue

New York, NY 10100

(Creditor) Judy G.Z. Liu

Dewey & LeBoeuf LLP

1301 Avenue of the Americas

New York, NY 10019

(212) 259-8512

(212) 259-6333 (fax)

judy.liu@dl.com

Assigned: 09/16/2008 representing The Bank of New York Mellon

(Creditor) Edward Joseph LoBello

Blank Rome LLP

405 Lexington Avenue

New York, NY 10174

(212) 885-5364

(212) 885-5002 (fax)

elobello@blankrome.com

Assigned: 09/16/2008 representing Thomson Reuters Corporation

(Creditor) Thomson Reuters PLC

(Creditor) Jacqueline Marcus

Weil Gotshal & Manges, LLP

767 5th Avenue

New York, NY 10153

(212) 310-8000

(212) 310-8007 (fax)

jacqueline.marcus@weil.com

Assigned: 09/17/2008 representing Lehman Brothers Holdings Inc.

745 Seventh Avenue

New York, NY 10019

(Debtor) Frank McGinn

Bartlett Hackett Feinberg P.C.

155 Federal Street

9th Floor

Boston, MA 02110

(617) 422-0200

(617) 422-0383 (fax)

ffm@bostonbusinesslaw.com

Assigned: 09/15/2008 representing Iron Mountain Information Management, Inc.

c/o Frank F. McGinn, Esq.

Bartlett Hackett Feinberg P.C.

155 Federal Street, 9th Floor

Boston, MA 02110

617-422-0200

617-422-0383 (fax)

ffm@bostonbusinesslaw.com

(Creditor) David C. McGrail

Law Offices of David C. McGrail

676A Ninth Avenue

#211

New York, NY 10036

(646) 290-6496

(646) 224-8377 (fax)

dmcgrail@davidmcgraillaw.com

Assigned: 09/19/2008 representing Iron Mountain Information Management, Inc.

c/o Frank F. McGinn, Esq.

Bartlett Hackett Feinberg P.C.

155 Federal Street, 9th Floor

Boston, MA 02110

617-422-0200

617-422-0383 (fax)

ffm@bostonbusinesslaw.com

(Creditor) Harvey R. Miller

Weil, Gotshal & Manges, LLP

767 Fifth Avenue

New York, NY 10153

(212) 310-8000

(212) 310-8007 (fax)

harvey.miller@weil.com

Assigned: 09/15/2008 representing Lehman Brothers Holdings Inc.

745 Seventh Avenue

New York, NY 10019

(Debtor) Harold S. Novikoff

Wachtell, Lipton, Rosen & Katz

51 West 52nd Street

New York, NY 10019

(212) 403-1000

(212) 403-2000 (fax)

hsnovikoff@wlrk.com

Assigned: 09/15/2008 representing JPMORGAN CHASE BANK, N.A.

270 Park Avenue

NY, NY 10017

(212)270-6000

(Unknown) R. Stephen Painter, Jr.

**Commodity Futures Trading Commission** 

140 Broadway

New York, NY 10005

(646) 746-9815

(646) 746-9940 (fax)

spainter@cftc.gov

Assigned: 09/17/2008

LEAD ATTORNEY representing Commodity Futures Trading Commission

(Unknown) Sydney G. Platzer

Platzer, Swergold, Karlin, Levine,

Goldberg & Jaslow, LLP

1065 Avenue of the Americas

18th Floor

New York, NY 10018

(212) 593-3000

(212) 593-0353 (fax)

splatzer@platzerlaw.com

Assigned: 09/16/2008 representing 250 East Borrower, LLC

c/o Platzer, Swergold et al

1065 Avenue of the Americas

18th Floor

New York, NY 10018

(Creditor) East 46th Borrower, LLC

c/o Platzer, Swergold et al

1065 Avenue of the Americas

18th Floor

New York, NY 10018

(Creditor) Hale Avenue Borrower, LLC

c/o Platzer, Swergold et al

1065 Avenue of the Americas

18th Floor

New York, NY 10018

(Creditor) Amanda Raboy

Covington & Burling LLP

620 Eigth Avenue

New York, NY 10018

(212) 841-1000

(212) 841-1010 (fax)

araboy@cov.com

Assigned: 09/16/2008 representing Wilmington Trust Company, as Indenture Trustee

520 Madison Avenue

33rd Floor

New York, NY 10022

212-415-0513 (fax)

(Creditor) John J. Rapisardi

Cadwalader, Wickersham & Taft LLP

One World Financial Center

New York, NY 10281

(212)504-6000

(212)504-6666 (fax)

john.rapisardi@cwt.com

Assigned: 09/18/2008 representing Citigroup Inc. and all of its affiliates, including Citibank,

N.A.

(Creditor) George Rosenberg

Arapahoe County Attorney's Office

5334 S. Prince Street

Littleton, CO 80166

(303) 738-7846

grosenberg@co.arapahoe.co.us

Assigned: 09/15/2008 representing Arapahoe County Treasurer

5334 S. Prince Street

Littleton, CO 80166

(Creditor) Douglas B. Rosner

Goulston & Storrs, P.C.

400 Atlantic Avenue

Boston, MA 02110

(617) 482-1776

(617) 574-6595 (fax)

drosner@goulstonstorrs.com

Assigned: 09/16/2008 representing Interactive Data Corporation

(Creditor) Chester B. Salomon

Stevens & Lee, P.C.

485 Madison Avenue

20th Floor

New York, NY 10022

(212) 319-8500

(212) 319-8505 (fax)

cs@stevenslee.com

Assigned: 09/16/2008 representing 1301 Properties Owner, L.L.C.

(Creditor) Assigned: 09/17/2008 representing 1301 Properties Owner, LP c/o Paramount

## Group, Inc.

(Creditor) Howard Seife

Chadbourne & Parke LLP

30 Rockefeller Plaza

New York, NY 10112

(212)408-5361

(212) 541-5369 (fax)

hseife@chadbourne.com

Assigned: 09/18/2008 representing GLG Partners LP

c/o Chadbourne & Parke LLP

30 Rockefeller Plaza

New York, NY 10112

United States

212-408-5100

212-541-5369 (fax)

hseife@chadbourne.com

(Creditor) Andrea Sheehan

Law Offices of Robert E. Luna, P.C.

4411 North Central Expressway

Dallas, TX 75205

(214) 521-8000

(214) 521-1738 (fax)

sheehan@txschoollaw.com

Assigned: 09/15/2008 representing Carrollton-Farmers Branch ISD

c/o Andrea Sheehan

Law Offices of Robert E. Luna, PC

4411 North Central Expressway

Dallas, TX 75205

214-521-8000

214-521-1738 (fax)

sheehan@txschoollaw.com

(Creditor) James H. Shenwick

Shenwick & Associates

655 Third Avenue

20th Floor

New York, NY 10017

212-541-6224

646-218-4600 (fax)

jhs7@att.net

Assigned: 09/16/2008 representing Collins Building Services

Court Square Place

24-00001 44th Road

Long Island City, NY 11101

(Creditor) Joseph E. Shickich, Jr.

Riddell Williams P.S.

1001 4th Ave Ste 4500

Seattle, WA 98154-1065

(206) 624-3600

(206) 389-1708 (fax)

jshickich@riddellwilliams.com

Assigned: 09/17/2008 representing Microsoft Corporation and Microsoft Licensing, GP

c/o Joseph E. Shickich, Jr.

Riddell Williams P.S.

1001 4th Ave Ste 4500

Seattle, WA 98154-1192

(206) 624-3600

(206) 91-00708 (fax)

jshickich@riddellwilliams.com

(Creditor) Ronald J. Silverman

Bingham McCutchen, LLP

399 Park Avenue

New York, NY 10022-4689

(212) 705-7868

(212) 752-5378 (fax)

ronald.silverman@bingham.com

Assigned: 09/18/2008 representing Harbinger Capital Partners Special Situations Fund L.P. and Harbert Distressed Investor Master Fund Ltd.

c/o Bingham McCutchen

399 Park Avenue

New York, NY 10022

212-705-7000

212-752-5378 (fax)

(Interested Party) Assigned: 09/19/2008 representing Harbinger Capital Partners Master

# Fund I, Ltd. (f/k/a Harbert Distressed Investment Master Fund Ltd.)

c/o Bingham McCutchen LLP

399 Park Avenue

New York, NY 10022

212-705-7000

212-752-5378 (fax)

(Interested Party) Harbinger Capital Partners Special Situations Fund L.P.

c/o Bingham McCutchen LLP

399 Park Avenue

New York, NY 10022

212-705-7000

212-752-5378 (fax)

(Interested Party) Keith A. Simon

Latham & Watkins, LLP

885 Third Avenue

New York, NY 60606

(212) 906-1200

(212) 751-4864 (fax)

keith.simon@lw.com

Assigned: 09/18/2008 representing Fannie Mae

(Unknown) Thomas R. Slome

Meyer. Suozzi, English & Klein, P.C.

990 Stewart Avenue, Suite 300

PO Box 9194

Garden City, NY 11530

516-741-6565

516-741-6706 (fax)

lgomez@msek.com

Assigned: 09/18/2008 representing Dresdner Kleinwort Group Holdings LLC

(Creditor) Elizabeth Page Smith

LeBoeuf, Lamb, Greene & MacRae, LLP

125 West 55th Street

New York, NY 10019

(212) 424-8580

(212) 649-0918 (fax)

esmith@llgm.com

Assigned: 09/17/2008 representing Customer Asset Protection Company

(Creditor) Mark A. Speiser

Stroock & Stroock & Lavan LLP

180 Maiden Lane

New York, NY 10038

(212) 806-5400

212-806-6006 (fax)

mspeiser@stroock.com

Assigned: 09/17/2008 representing Mizuho Corporate Bank, Ltd.

(Creditor) Malani Sternstein

Sheppard Mullin Richter & Hampton, LLP

30 Rockefeller Plaza

24th Floor

New York, NY 10112

(212) 332-3800

(212) 332-3888 (fax)

msternstein@sheppardmullin.com

Assigned: 09/16/2008 representing Bank of New York Mellon

(Unknown) Harvey A. Strickon

Paul, Hastings, Janofsky & Walker LLP

75 East 55th Street

New York, NY 10022-3205

(212) 318-6000

(212) 230-7689 (fax)

harveystrickon@paulhastings.com

Assigned: 09/15/2008 representing General Electric Capital Corporation

(Unknown) Scott Talmadge

Kaye Scholer, LLP

425 Park Avenue

New York, NY 10022

(212) 836-7039

(212) 837-7157 (fax)

stalmadge@kayescholer.com

Assigned: 09/19/2008 representing Wells Fargo & Co.

(Creditor) Wells Fargo, N.A.

(Creditor) My Chi To

Debevoise & Plimpton, LLP

919 Third Avenue

New York, NY 10022

(212) 909-7425

(212) 909-6836 (fax)

mcto@debevoise.com

Assigned: 09/18/2008 representing Rock-Forty-Ninth LLC

(Interested Party) Rockefeller Center Management Corporation

(Interested Party) Rockefeller Center North, Inc.

(Interested Party) Rockefeller Group Development Corporation

(Interested Party) Amit K. Trehan

Mayer Brown LLP

1675 Broadway

New York, NY 10019

(212) 506-2198

(212) 262-1910 (fax)

atrehan@mayerbrown.com

Assigned: 09/15/2008 representing Canadian Imperial Bank of Commerce, CIBC World Markets Corp., and CIBC World Markets Inc.

(Creditor) SOCIETE GENERALE

(Creditor) Sumitomo Mitsui Banking Corporation, SMBC Capital Markets, Inc., and Sumitomo Mitsui Banking Corporation Brussels Branch

(Creditor) Assigned: 09/18/2008 representing Washington Mutual Bank and Washington Mutual, Inc.

(Creditor) Michael J. Venditto

Reed Smith LLP

599 Lexington Avenue

New York, NY 10022

(212) 205-6081

212-521-5450 (fax)

mvenditto@reedsmith.com

Assigned: 09/16/2008 representing Galleon Buccaneer?s Offshore, Ltd

(Unknown) Shai Waisman

Weil, Gotshal & Manges, LLP

767 5th Avenue

New York, NY 10153

(212) 310-8274

(212) 310-8007 (fax)

shai.waisman@weil.com

Assigned: 09/15/2008 representing Lehman Brothers Holdings Inc.

745 Seventh Avenue

New York, NY 10019

(Debtor) Elizabeth Weller

Linebarger Goggan Blair & Sampson, LLP

2323 Bryan Street

**Suite 1600** 

Dallas, TX 75201-2691

(214) 880-0089

(469) 221-5003 (fax)

dallas.bankruptcy@publicans.com

Assigned: 09/15/2008 representing **Dallas County** 

c/o Linebarger Goggan Blair & Sampson

Elizabeth Weller

2323 Bryan Street

**Suite 1600** 

Dallas, TX 75201

214-880-0089

469-221-5002 (fax)

dallas.bankruptcy@publicans.com

(Creditor) Tarrant County

c/o Linebarger Goggan Blair & Sampson

Elizabeth Weller

2323 Bryan Street

**Suite 1600** 

Dallas, TX 75201

214-880-0089

469-221-5002 (fax)

dallas.bankruptcy@publicans.com

(Creditor) Erin Zavalkoff

Vedder Price

1633 Broadway

47th Floor

New York, NY 10019

(212) 407-6921

(212) 407-7799 (fax)

ezavalkoff-babej@vedderprice.com

Assigned: 09/18/2008 representing Pursuit Capital Partners Master (Cayman) Ltd.

333 Ludlow Street North Tower

4th Floor

Stamford, CT 06902

Ezavalkiff-babej@vedderprice.com

(Creditor) Peter Alan Zisser

Holland & Knight, LLP

195 Broadway

New York, NY 10007

(212) 513-3200

(212) 385-9010 (fax)

peter.zisser@hklaw.com

Assigned: 09/17/2008 representing Monument Realty LLC

(Creditor)

1.